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RLINGAME, A.H.		
SBY, W.S.		
RNIVAL, G.J.		
RDOVA, R.C.		
VIS, J.G.		
RRERA, D.W.		
AY, R.E.		
IS, J.A.		
OVER, W.S.		
LAN, P.M.		
NNI, B.J.		
ALY, T.J.		
DAHL, T.G.		
BIG, J.G.		
TCHINS, N.M.		
CKSON, D.T.		
LL, R.E.		
ESTER, A.W.		
RX, G.E.		
DONALD, M.M.		
KENNA, F.G.		
ORGAN, R.V.		
ZUTO, V.M.		
ITTER, G.L.		
NDLIN, N.B.		
TERWHITE, D.G.		
HUBERT, A.L.		
HWARTZ, J.K.		
TLOCK, G.H.		
IGER, S.G.		
BIN, P.M.		
ORHEIS, G.M.		
LSON, J.M.		
KEITH S	X	
FERRIER D	X	
ILYCCI J	X	
HOLLOWELL I	X	
SCHRADER D	X	

CVD. W/O ENC.

CORRES. CONTROL	X	X
MIN RECORD/080	X	2
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Reviewed for Addressee
Corres. Control RFP

9-26-94
DATE BY

el Ltr. #

DOE ORDER # 5400.1



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Department of Energy

SEP 26 9 53 AM '94
SEP 1994

EC&C
ROCKY FLATS FIELD
CORRESPONDENCE CONTROL
RECEIVED

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

11000	
11100	
11200	
11300	94-DOE-0061
11400	
11500	
11600	
11700	

Mr. Fredrick R. Dowsett, Section Chief
Monitoring and Enforcement
Hazardous Waste Control Program
Colorado Department of Public Health and Environment
4300 Chery Creek Drive South
Denver, Colorado 80222-1530

Dear Mr. Dowsett:

The Department of Energy (DOE), Rocky Flats Field Office (RFFO), hereby resubmits the revision to the March 1993, 904 Pad Compliance Plan per your September 12, 1994, letter. This enclosure combines into one document the three previous formal submittals to the Colorado Department of Public Health and Environment (CDPHE), provided since March 1994, updating the 1993 Compliance Plan. The Rocky Flats Environmental Technology Site (Site) has now completed the procurement process for the containers and on September 14, 1994, awarded the contract to the vendor. As committed in our June 29, 1994, letter, we are including an updated schedule for the repackaging activities based upon the specific delivery schedules offered by the winning vendor. Per your request, the schedule will be placed in the Plant Action Tracking System and biweekly updates will be provided to CDPHE with the first update schedule for September 26, 1994.

It needs to be restated that the schedule provided to CDPHE in the March 23, 1994, submittal of the Compliance Plan Update was a draft schedule. In the April 6, 1994, meeting, the Site representatives communicated this to CDPHE. The Site representatives stated that although we were comfortable with the duration for the repackaging activities contained in the schedule, there was a degree of uncertainty associated with the length of the procurement process which could impact the start of repackaging. We committed to investigate ways to expedite the scheduled activities. Unfortunately, the procurement of the containers was not as simple an action as was originally indicated. This was communicated to CDPHE representatives during one of the many meetings that have occurred dealing with the 904 Pad Plan and we committed to submitting a revised schedule to CDPHE once the vendor was selected and the contract was awarded.

Even though the container procurement was delayed from our original estimated date, there have been, since April, a significant number of physical actions, costing approximately \$1.0 million, executing the provisions of the Compliance Plan.

ADMIN RECCRD

IA-IA-A-00250

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SEP 23 1994

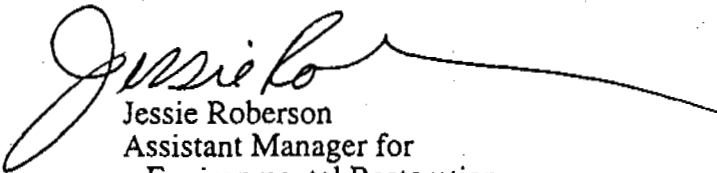
In addition to these construction activities, work had begun on the 904 Pad focusing on the need to make room for the repackaging efforts. During down time on the pond sludge cleanout project, workers have begun making room for the repackaging project activities by clearing out unnecessary equipment, unused crates and waste drums, and miscellaneous material.

It concerns RFFO that there is the perception conveyed by the CDPHE letter that there has been no action on the Compliance Plan and no regular communication with CDPHE on the various aspects of the Plan. This is inaccurate. There have been frequent meetings, discussions and correspondence between the Site and CDPHE focusing on the 904 Pad Compliance plan and the progress being made in these areas. Additionally, the CDPHE staff has participated in walkdowns of the Pads to survey the construction activities.

To ensure that we were addressing the correct issues in the Plan, RFFO has formally requested comments from CDPHE. The RFFO has received some formal comments and a large number of informal input and comments from CDPHE on the Plan. After incorporating comments, RFFO had additionally requested formal concurrence from CDPHE on the Plan to ensure that the approach is one that is sufficient to meet the needs of CDPHE and to ensure that the approximate \$6.0 million expenditure is being directed to a final solution to this issue. To date, we have not received this concurrence and it causes us some concern that there may still be issues on this subject within CDPHE that are not being communicated to the Site in time to effect a final solution.

The RFFO is committed to executing the 904 Pad Compliance Plan as quickly and as safely as possible. We believe that the activities undertaken to date provide evidence to support this assertion. If there are any questions, please contact Frazer Lockhart at 966-7846.

Sincerely,


Jessie Roberson
Assistant Manager for
Environmental Restoration

Enclosure

SEP 23 1994

F. Dowsett
94-DOE-10061

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cc w/o Enclosure:
C. Gilbreath, CDPHE
C. Alstatt, CDPHE
M. Silverman, OOM, RFFO
L. Smith, OOM, RFFO
J. Roberson, ER, RFFO
M. Vargas, WMD, RFFO
J. Liefer, RSG, RFFO
S. Howard, SAIC
M. Witherill, SAIC
S. Keith, EG&G
D. Ferrier, EG&G
J. Ciucci, EG&G

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